

EXHIBIT J

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

- - -
RICHARD CHAKEJIAN, : CIVIL ACTION
Plaintiff, :
V. :
EQUIFAX INFORMATION :
SERVICES, LLC, :
Defendant. : NO. 07-2211

ORIGINAL

- - -
Oral deposition of RICHARD CHAKEJIAN,
held at the offices of Francis & Mailman, P.C.,
100 South Broad Street, 19th Floor, Philadelphia,
Pennsylvania 19110, commencing at 5:35 p.m., on
Friday, July 18, 2008, before Sandra J. Worrell, a
Registered Professional Reporter and Notary
Public.

- - -
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Richard Chakejian

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Q. Let me show you what's been marked as Exhibit Number 12, which is a March 4, 2007 letter. Do you recognize Exhibit Number 12?

A. Yes.

Q. Is that a letter that you sent to Equifax?

A. Yes.

Q. Is that a complete copy? We looked at one before. I know you said that you couldn't tell as a matter of fact that that was the complete copy, but can you tell if this is a complete copy of the

Richard Chakejian

1 letter and the enclosures that you sent to Equifax
2 on March 4, 2007?

3 A. A copy of the letter, yes. A copy of the
4 driver's license and social, yes. A copy of the
5 letter dated January 16th, yes. I don't see where
6 I reference the -- oh, I do. Page 2 of the credit
7 file, yes. A copy of the -- or, shall I say,
8 pages 5 and 6 of the court order and a copy of the
9 envelope, which I mailed, too. And I don't know
10 what the back page is, but --

11 Q. Okay. This looks to be a complete copy of
12 everything you sent to Equifax on March 4, 2007;
13 correct?

14 A. It looks to be complete. However, I take
15 notice to what you had pointed out earlier, that
16 with respect to the Court Order, it's numbered
17 five on the front page and six on the back page.

18 Standing here at this moment, I'm not sure
19 if there was a one, two, three and four or if that
20 was the complete one.

Richard Chakejian

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5 Q. Okay. Did you go to the United States
6 Bankruptcy Court and obtain that stamp on these
7 two pages?

8 A. I did.

9 Q. You didn't send somebody to do it? You did
10 it yourself?

11 A. No, I did it myself.

12 Q. You didn't have any trouble finding the
13 place. You had been there before; right?

14 A. Don't know that I had been there before,
15 but I don't remember having any trouble finding
16 it.

17 Q. Was it at the Robert Nix Federal Building?
18 I believe it's 900 Market Street, Room 400?

19 A. I don't know for certain about that one.

20 Q. Okay. Well, in order to go get that
21 document, did you rely on the information Equifax
22 provided you about the address of the source?

23 A. I don't know. I may have asked Weir or one
24 of the other attorneys I deal with in other

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1 matters where I could obtain a certified copy.

2 The certified copy business did not come up
3 until after I had called, when the letter that we
4 talked about earlier came back. And I was told
5 that they weren't going to remove it based upon
6 the Court Order that was sent.

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Richard Chakejian

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Q. Sir, do you know of anything that Equifax
did that was reckless towards you?

MR. SOUMILAS: Objection to the
extent that it asks for a legal conclusion.
This witness lacks foundation for
recklessness.

BY MR. PERLING:

Q. Do you?

A. I don't, no.

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EQUIFAX

March 4th 2007

P.O. Box # 74021

Atlanta, GA 30374-0241

RE Credit File

Confirmation # 7030023613

Dear Sirs & Madams,

I am in receipt of my credit report identified with the Confirmation # 7030023613, dated February 14 2007

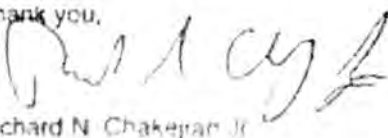
Please be advised that I am disputing the Bankruptcy information listed in the Public Records portion of my report. I have enclosed a copy of page #2 of my credit file dated 2/14/07 for your ease of identification.

Kindly note that I previously disputed the Bankruptcy information on or around January 16, 2007. I am also enclosing a copy of that dispute for your ease of identification.

I followed up with EQUIFAX on 1/30/07 around 9:45am est to check on the status of my 1/16/07 dispute. Initially the follow up was handled by your representative Honey who told me that you would not be removing the Bankruptcy information because the Court Order was not on Court letterhead. I then spoke to her supervisor, Pauline, who acknowledged that the document was on court letterhead. Pauline told me that it was necessary to have a CERTIFIED and STAMPED COURT ORDER in order to have the bankruptcy information removed from my report.

Accordingly I am enclosing a CERTIFIED and STAMPED COURT ORDER concurrent with your request so that you may correct my report and remove the incorrect Bankruptcy information from my credit file as ordered by the court on page #2 of the enclosed COURT ORDER.

Thank you,



Richard N. Chakejian Jr.

enc. #1 copy of drivers license & social security card

#2 page #2 of credit file dated 2/14/07

#3 dispute letter dated 1/16/07

#4 CERTIFIED & STAMPED COURT ORDER

EXHIBIT

12

EIS-Chakejian-00082

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EQUIFAX

January 16th 2008

P.O. Box # 740241

Atlanta, GA 30374 - 0241

Dear Sirs and/or Madams,

I am in receipt of my credit report dated 1/16/07.

I noticed an error on my credit report under the PUBLIC RECORDS category.

Please be advised that I have never filed for BANKRUPTCY and that you are reporting an error that is negatively impacting my credit profile and my credit score.

Kindly correct the error by removing the bankruptcy information from my credit report.

To assist you I am enclosing a COURT ORDER issued by the Honorable Stephen Rastavich, USBJ ordered May 17th 2006, specifically ordering that "ANY ADVERSE CREDIT INFORMATION MUST BE STRICKEN FROM MY CREDIT RECORDS."

Please adhere to the Judges order and remove the Bankruptcy information from my file.

Upon your receipt and review of this letter and the Court Order please make the corrections to my file and mail me a copy of my corrected CREDIT REPORT AND SCORE to my home address: Richard N. Chakejian Jr.

2137 Art School Rd.

Chester Springs, PA 19425

Should you have any questions concerning the information received and/or my request kindly contact me via phone # 484-645-5148 or e-mail: chakejian@cs.com.

Thank you,

Richard N. Chakejian Jr.

enc. COURT ORDER 5/17/06

CREDIT REPORT 1/16/07

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EIS-Chakejian-00084

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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

CHAPTER 7

Richard Chakejian, Jr. and
Jacqueline Chakejian

Case No. 05-32489 (SR)

Debtors.

STIPULATION OF DISMISSAL OF DEBTORS' MOTION
FOR SANCTIONS, COMPENSATORY AND PUNITIVE DAMAGES

Background:

Edward T. McElean, Joseph Ripp, Chibi, Inc., and Tarasus, Inc. (collectively Ripp, Chibi, Tarasus, Inc. and McElean are referred to as the "Petitioning Creditors") filed an involuntary bankruptcy petition (the "Involuntary Petition") against the Putative Debtors, Richard Chakejian, Jr. and Jacqueline Chakejian in the above reference bankruptcy matter. The Chakejians has disputed the Involuntary Petition and have claimed, among other things, that the Bankruptcy Petition was fraudulent in that they did not own any debts to Edward T. McElean, Tarasus, Inc., Chibi, Inc., Joseph Ripp, and Middletown Estate Developers, Inc..

At a hearing on the filing of the Involuntary Petition, Edward T. McElean, Chibi, Inc., Joseph Ripp, and withdrew the petition and this bankruptcy matter was dismissed, and an injunction was issued by bankruptcy judge Raskovich enjoining Edward T. McElean, Chibi, Inc., Joseph Ripp from filing any future bankruptcy petition against the Chakejians. Thereafter, the Chakejians filed a motion for sanctions and attorney's fees, costs, consequential and punitive damages (the "Motion").

Edward T. McElean, Chibi, Inc., Joseph Ripp and the Chakejians have now reached an agreement to settle the Chakejians' Motion. As part of that agreement, Edward T. McElean, Chibi, Inc., Joseph Ripp have acknowledge that the filing of the Involuntary Petition was


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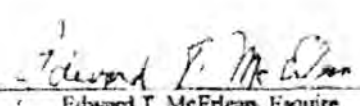
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inappropriate, improper and that the Involuntary Petition should never have been filed. As a part thereof, Edward T. McErlan, Chibi, Inc., Joseph Ripp and the Chakejians, by and through their respective Counsel have stipulated and agreed that the Motion shall be dismissed with prejudice inasmuch as the parties have settled all claims asserted in the Motion.

NOW, THEREFORE, Edward T. McErlan, Chibi, Inc., Joseph Ripp and the Chakejians, hereby agree that the Motion is hereby withdrawn, with prejudice, this 15th day of May, 2006, and that any adverse credit report to any credit reporting agency should be stricken from the Chakejians' credit records.


Walter Weir Jr., Esquire
Counsel for the Chakejians


Edward T. McErlan, Esquire
Counsel for the Petitioning Creditors

THE FOREGOING IS HEREBY INCORPORATED AS AN ORDER OF THIS COURT AND

IT IS SO ORDERED this 17th day of May, 2006.

BY THE COURT:


Stephen Raslavich, USBJ

U.S. COURT OF APPEALS
FOR THE NINTH CIRCUIT
DATE: May 17, 2006
ATTEST: 
U.S. CLERK

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Chadjejian
2137 Old School Road
Chester Springs, Pa 19425



Equifax
PO Box # 74021
Atlanta, GA
30374-0241

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